

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

THE STATE OF LOUISIANA	*	CIVIL ACTION NO.: 6:24-cv-1422
	*	
VERSUS	*	JUDGE DAVID C. JOSEPH
	*	
ALEJANDRO MAYORKAS,	*	MAG. JUDGE DAVID J. AYO
SECRETARY OF THE U.S.	*	
DEPARTMENT OF HOMELAND	*	
SECURITY IN HIS OFFICIAL	*	
CAPACITY, ET AL	*	

GEO'S WITNESS LIST AND EXHIBIT LIST

NOW INTO COURT, through undersigned counsel, comes the Defendant, The GEO Group, Inc., who submits the following Witness and Exhibit List in connection with the Preliminary Injunction Hearing in this matter:

WITNESS LIST

1. David Tackett
The GEO Group, Inc.
Regional Health Services Manager - Central
3843 Stagg Avenue
Basile, Louisiana 70515

2. Dr. Chad Heinen, M.D.
The GEO Group, Inc.
Physician
South Louisiana ICE Processing Center
3843 Stagg Avenue
Basile, Louisiana 70515

3. Helen Grimes
The GEO Group, Inc.
Facility Administrator
South Louisiana ICE Processing Center
3843 Stagg Avenue
Basile, Louisiana 70515

4. Carissa Toups, DC, BS, MHA
The GEO Group, Inc.
Health Services Administrator
South Louisiana ICE Processing Center
3843 Stagg Avenue
Basile, Louisiana 70515

EXHIBIT LIST

1. A copy of The GEO Group, Inc.'s Correctional Health Services Number 528-A, Title: Tuberculosis Prevention and Management, Inmates/Detainees/Residents, Chapter: Infection Control effective 10/01/2020.

This document contains confidential and proprietary information. GEO will be filing a request that this exhibit be sealed and produced to parties for attorneys' eyes only.

2. A copy of The GEO Group, Inc.'s Clinical Practice Guidelines: Management of Tuberculosis, May 2017.

This document contains confidential and proprietary information. GEO will be filing a request that this exhibit be sealed and produced to parties for attorneys' eyes only.

3. A copy of SLIPC's TB Signs/Symptoms Checklist

Respectfully Submitted,

MAHTOOK & LAFLEUR, L.L.C.

/s/Kay A. Theunissen

ROBERT A. MAHTOOK, JR., #17034

KAY A. THEUNISSEN, #17448

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Attorneys for: The GEO Group, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has this date been served on all counsel of record in this proceeding by:

- | | |
|--|--|
| <input type="checkbox"/> Hand Delivery | <input type="checkbox"/> Prepaid U.S. Mail |
| <input type="checkbox"/> Facsimile | <input type="checkbox"/> Federal Express |
| <input type="checkbox"/> Electronic Mail | <input checked="" type="checkbox"/> CM/ECF Court Filing System |

Lafayette, Louisiana this 25th day of October 2024

/s/ Kay A. Theunissen
KAY A. THEUNISSEN